Enclosure II: Scorecard of Office of Personnel Management's (OPM) Implementation of GAO's Background Investigation Recommendations, August 2013

#	GAO Recommendation	Agency/ position	Implementation status	Agency efforts to date			
Se	Security Clearances: Agencies Need Clearly Defined Policy for Determining Civilian Position Requirements. GAO-12-800. July 12, 2012.						
1	GAO recommended that the Office of the Director of National Intelligence (ODNI), in coordination with the Office of Personnel Management (OPM) and other executive branch agencies as appropriate, issue clearly defined policy and procedures for federal agencies to follow when determining if federal civilian positions require a security clearance.	OPM: Did not state concur or non-concur ODNI: Concur	Open	GAO made this recommendation primarily to the Director of National Intelligence (DNI) in the capacity as Security Executive Agent responsible for developing uniform and consistent policies related to the security clearance process. According to officials from ODNI, ODNI and OPM are in the process of issuing a joint revision to part 732 of Title 5 of the Code of Federal Regulations, which provides requirements and procedures for the designation of national security positions. As of July 2013, ODNI and OPM had obtained permission from the President to re-issue the regulation jointly, drafted the proposed rule, and obtained public input on the regulation by publishing it in the Federal Register. According to ODNI and OPM, they will jointly adjudicate public comments and prepare the final rule for approval from the Office of Management and Budget (OMB). This recommendation remains open until these actions are complete.			
2	GAO recommended that, once the policy and procedures are issued (see #1 above), the DNI and the Director of OPM	OPM: Concur	Open	GAO made this recommendation jointly to OPM and the DNI. OPM and ODNI must complete the joint revision to part 732 of Title 5 of the Code of Federal Regulations before they can revise the position			

¹Designation of National Security Positions in the Competitive Service, and Related Matters, 78 Fed. Reg. 31847-01 (2013). That notice indicates that the proposed rule is to be reissued and renumbered in a new chapter IV, part 1400 of title 5, Code of Federal Regulations.

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collaborate in their respective roles as Executive Agents ² to revise the position designation tool to reflect that guidance. ³			designation tool. However, according to OPM and ODNI officials, as of July 2013, OPM and ODNI were discussing the development of a project plan to revise the Position Designation Tool. This recommendation remains open until OPM and ODNI jointly revise the position designation tool.
GAO recommended that OPM provide customer agencies with better information on the costs of background investigations, including the data related to its main cost drivers, in order to clarify to the extent possible how costs align with and affect investigation prices.	OPM: Concur	Open	OPM recently provided updates of steps it has take to address our recommendation. For example, in December 2012, OPM published its first annual report to stakeholders, which includes OPM Federal Investigative Services operating expenses, cost drivers, and a description of a cost allocation model that is under development. According to OPM, this cost allocation model will identify the differences in cost structure for federal employee- and contractor-led investigations, inform a sustainable fee structure by linking the cost of operations to the different fees OPM charges to recover the costs, and
			design a repeatable process to develop cost data to

²In June 2008, Executive Order 13467 established a Suitability and Security Clearance Performance Accountability Council, appointed the Deputy Director for Management at the Office of Management and Budget as the chair of the council, designated the Director of National Intelligence (DNI) as the Security Executive Agent, and designated the Director of OPM as the Suitability Executive Agent.

³ GAO found that, in the absence of policy and procedures to determine if federal civilian positions require a security clearance, agencies are using a position designation tool that OPM designed to determine the sensitivity and risk levels of civilian positions. The position designation tool is a tool that OPM designed to determine the sensitivity and risk levels of civilian positions which, in turn, inform the type of background investigation the position requires.

⁴ Office of Personnel Management, Federal Investigative Services, *Annual Stakeholder Report for Fiscal Year 2012*, (December 2012).

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				support fee studies.
				This recommendation remains open until the cost allocation model, which is to align OPM costs with investigation prices, is complete.
4	GAO recommended that OPM take actions to identify process efficiencies that could lead to cost savings within its background investigation process.	OPM: Concur	Open	In a February 2013 update to GAO, OPM provided a summary of various process efficiency studies that it had conducted or contracted for, including a study of business processes, information technology transformation and modernization initiatives, and a study of staff utilization. This recommendation remains open until OPM provides documentation that those studies took place.
	GAO recommended that OPM measure the frequency with which its investigative reports meet federal investigative standards, so that the executive branch can identify the factors leading to			In response to our 2009 recommendation, on August 1, 2013, OPM provided GAO with a Review Quality Tool that it states it is using to review investigations against investigative standards. This submission was in addition to information that OPM had previously provided to GAO in an effort to address this recommendation.
	incomplete reports and include the results of such measurement in the annual report to Congress on clearances required by the Intelligence Reform and Terrorism Prevention Act of 2004.			This recommendation remains open until GAO is able to assess the extent to which OPM is using this tool to measure the quality of its background investigations conducted by its federal and contractor personnel. In response to the requests of Senators McCaskill and Johnson, in their roles as Chairman and Ranking Member of the Subcommittee on Financial and Contracting Oversight, and of

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		investigations.